

FINAL DRAFT/PROPOSED CAAPP PERMIT
United States Can Company
I.D. No.: 031438AAN
Application No.: 95120106
September 2, 2004

217/782-2113

"RENEWAL"
TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT
and
TITLE I PERMIT¹

PERMITTEE

United States Can Company
Attn: Alan R. Gans
1717 Gifford Road
Elgin, Illinois 60120

<u>Application No.:</u> 95120106	<u>I.D. No.:</u> 031438AAN
<u>Applicant's Designation:</u>	<u>Date Received:</u> December 1, 2003
<u>Operation of:</u> Can Manufacturing	
<u>Date Issued:</u> TO BE DETERMINED	<u>Expiration Date:</u> TO BE DETERMINED
<u>Source Location:</u> 1717 Gifford Road, Elgin, Cook County	
<u>Responsible Official:</u> Don DesRochers, Director of Operations	

This permit is hereby granted to the above-designated Permittee to OPERATE a metal can manufacturing plant, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

If you have any questions concerning this permit, please contact Anatoly Belogorsky at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:AB:psj

cc: Illinois EPA, FOS, Region 1

¹ This permit may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the CAA and regulations promulgated thereunder, including 40 CFR 52.21 - federal PSD and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within this permit.

² Except as provided in Condition 8.7 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

United States Can Company
1701 Gifford Road
Elgin, Illinois 60120
847/888-5538

I.D. No.: 031438AAN

Standard Industrial Classification: 3411, Metal Can Manufacturing

1.2 Owner/Parent Company

United States Can Company
1701 Gifford Road
Elgin, Illinois 60120

1.3 Operator

United States Can Company
1701 Gifford Road
Elgin, Illinois 60120

Alan R. Gans
847/888-5538

1.4 General Source Description

United States Can Company located at 1717 Gifford Road in Elgin and produces aerosol and oblong can production. The can manufacturing consists of coating/varnish lines, sheet fed offset lithographic printing lines, and assembly lines.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

ACMA	Alternative Compliance Market Account
Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
ATU	Allotment Trading Unit
BAT	Best Available Technology
Btu	British thermal unit
°C	Degrees Celsius
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
cfm	Cubic foot per minute
CFR	Code of Federal Regulations
CMS	Continuous Monitoring System
CO	Carbon Monoxide
DRE	Destruction and Removal Efficiency
dscf	Dry standard cubic foot
dscm	Dry standard cubic meter
°F	Degrees Fahrenheit
ft	Feet
g	Grams
gal	Gallon
gr	Grains
HAP	Hazardous Air Pollutant
HCl	Hydrogen Chloride
Hg	Mercury
HWC	Hazardous Waste Combustor
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
ILCS	Illinois Compiled Statutes
Illinois EPA	Illinois Environmental Protection Agency
kW	kilowatts
L	Liter
LAER	Lowest Achievable Emission Rate
lb	pound
MACT	Maximum Achievable Control Technology
Mg	Micrograms
mg	Milligrams
mmBtu	Million British thermal units
mmscf	Million standard cubic feet
mo	Month
MW	Megawatts
NESHAP	National Emission Standards for Hazardous Air Pollutants
NIC	Notification of Intent to Comply
NOC	Notification of Compliance

NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM ₁₀	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
POHC	Principal Organic Hazardous Constituent
ppm	parts per million
ppmv	Parts per million by volume
PSD	Prevention of Significant Deterioration
RCRA	Resource Conservation and Recovery Act
RMP	Risk Management Plan
RTO	Regenerative Thermal Oxidizer
scf	Standard cubic feet
scm	Standard cubic meters
SO ₂	Sulfur Dioxide
T	Tons
TEQ	Toxic Equivalency Quotient
T1	Title I - identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New - identifies Title I conditions that are being established in this permit
T1R	Title I Revised - identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material
yr	Year

3.0 INSIGNIFICANT ACTIVITIES

3.1 Identification of Insignificant Activities

The following activities at the source constitute insignificant activities as specified in 35 IAC 201.210:

- 3.1.1 Activities determined by the Illinois EPA to be insignificant activities, pursuant to 35 IAC 201.210(a) (1) and 201.211, as follows:

Parts Cleaning Stations;
Seam Soldering;
End Seal Compound Application; and
Video Jet Ink Application

- 3.1.2 Activities that are insignificant activities based upon maximum emissions, pursuant to 35 IAC 201.210(a) (2) or (a) (3), as follows:

Seam Welders

- 3.1.3 Activities that are insignificant activities based upon their type or character, pursuant to 35 IAC 201.210(a) (4) through (18), as follows:

- a. Direct combustion units designed and used for comfort heating purposes and fuel combustion emission units as follows: (A) Units with a rated heat input capacity of less than 2.5 mmBtu/hr that fire only natural gas, propane, or liquefied petroleum gas; (B) Units with a rated heat input capacity of less than 1.0 mmBtu/hr that fire only oil or oil in combination with only natural gas, propane, or liquefied petroleum gas; and (C) Units with a rated heat input capacity of less than 200,000 Btu/hr which never burn refuse, or treated or chemically contaminated wood [35 IAC 201.210(a) (4)].
- b. Equipment used for the melting or application of less than 50,000 lb/hr of wax to which no organic solvent has been added.

- 3.1.4 Activities that are considered insignificant activities pursuant to 35 IAC 201.210(b).

3.2 Compliance with Applicable Requirements

Insignificant activities are subject to applicable requirements notwithstanding status as insignificant activities. In particular, in addition to regulations of general applicability, such as 35 IAC 212.301 and 212.123 (Condition 5.2.2), the Permittee shall comply with the following requirements, as applicable:

- 3.2.1 For each cold cleaning degreaser, the Permittee shall comply with the applicable equipment and operating requirements of 35 IAC 215.182, 218.182, or 219.182.
- 3.2.2 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit's process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.
- 3.2.3 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 215.301, 218.301, or 219.301, which requires that organic material emissions not exceed 8.0 pounds per hour or do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.

3.3 Addition of Insignificant Activities

- 3.3.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).
- 3.3.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12) (b) of the Act.
- 3.3.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Equipment	Description	Emission Control Equipment
Group 1	Can Coating Lines - Sheet Base Coat	Three Coating Lines (C1, C2, C10)	Permanent Total Enclosure and Regenerative Thermal Oxidizer
Group 2	Sheet Fed Offset Lithographic Printing Lines	Press Lines ##3,4 with Varnish Coaters PC-3, 4	Permanent Total Enclosure and Regenerative Thermal Oxidizer
		Five Sheet Fed Offset Lithographic Printing Lines (5 through 9) with Varnish Applicators	None
Group 3	Side Seam Spray Coating Lines	Aerosol Lines (##1-11) Oblong Lines ##23 and 25	Filters
Group 4	Natural Gas-Fired Combustion Units	-Six Identical Natural Gas-Fired Heaters with Total Firing Rate 39.6 mmBtu/Hr; -Three Curing Ovens (For Coating Lines); -Two Curing Ovens for Printing Lines.	None

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

- 5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of VOM and HAP emissions.

5.2 Applicable Regulations

- 5.2.1 Specific emission units at this source are subject to particular regulations as set forth in Section 7 (Unit-Specific Conditions) of this permit.
- 5.2.2 In addition, emission units at this source are subject to the following regulations of general applicability:
 - a. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.
 - b. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, pursuant to 35 IAC 212.123(a), except the following as allowed by 35 IAC 212.123(b):

The emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 m (1000 ft) radius from the center point of any other such emission unit owned or operated by such person, and provided further that such opaque emissions permitted from each such emission unit shall be limited to 3 times in any 24 hour period.

5.2.3 Ozone Depleting Substances

The Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except

as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

5.2.4 Risk Management Plan

Should this stationary source, as defined in 40 CFR Section 68.3, become subject to the Accidental Release Prevention regulations in 40 CFR Part 68, then the owner or operator shall submit [40 CFR 68.215(a)(2)(i) and (ii)]:

- a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or
- b. A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan (RMP), as part of the annual compliance certification required by 40 CFR Part 70 or 71.

- 5.2.5
 - a. Should this stationary source become subject to a regulation under 40 CFR Parts 60, 61, or 63, or 35 IAC after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by 40 CFR Part 70 or 71.
 - b. No later than upon the submittal for renewal of this permit, the owner or operator shall submit, as part of an application, the necessary information to address either the non-applicability of, or demonstrate compliance with all applicable requirements of any potentially applicable regulation

which was promulgated after the date issued of this permit.

5.2.6 NSPS and NESHAP

The affected source is subject to requirements of 40 CFR Part 63 Subpart KKKK, "National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Cans". For an existing affected source, the compliance date is established at November 13, 2006. By this date, the Permittee shall submit revisions to the Title V permit by addressing method(s) of compliance and compliance with other applicable requirements established by Subpart KKKK.

5.2.7 CAM

The affected source is subject to CAM requirements under 40 CFR Part 64. Specifics on CAM are addressed further in Conditions 7.1.8, 7.2.8, and Attachment 4 of this permit.

5.2.8 Episode Action Plan

- a. If the source is required to have an episode action plan pursuant to 35 IAC 244.142, the Permittee shall maintain at the source and have on file with the Illinois EPA a written episode action plan (plan) for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The plan shall contain the information specified in 35 IAC 244.144.
- b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared.
- c. If a change occurs at the source, which requires a revision of the plan (e.g., operational change, change in the source contact person), a copy of the revised plan shall be submitted to the Illinois EPA for review within 30 days of the change. Such plans shall be further revised if disapproved by the Illinois EPA.
- d. For sources required to have a plan pursuant to 35 IAC 244.142, a copy of the original plan and any subsequent revisions shall be sent to:
 - i. Illinois EPA, Compliance Section; and
 - ii. For sources located in Cook County and outside of the city of Chicago: Cook County Department of Environmental Control

5.3 Non-Applicability of Regulations of Concern

None

5.4 Source-Wide Operational and Production Limits and Work Practices

In addition to the source-wide requirements in the Standard Permit Conditions in Section 9, the Permittee shall fulfill the following source-wide operational and production limitations and/or work practice requirements:

None

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

The annual emissions from the source, not considering insignificant activities as addressed by Section 3.0 of this permit, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. These limitations (Condition 5.5.1) are set for the purpose of establishing fees and are not federally enforceable.

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	201.69
Sulfur Dioxide (SO ₂)	0.17
Particulate Matter (PM)	3.60
Nitrogen Oxides (NO _x)	31.82
HAP, not included in VOM or PM	---
Total	237.28

5.5.2 Emissions of Hazardous Air Pollutants

Source-wide emission limitations for HAPs as listed in Section 112(b) of the CAA are not set. This source is considered to be a major source of HAPs.

5.5.3 Other Source-Wide Emission Limitations

The nonattainment NSR VOM netting analysis from the past construction/modification projects may be found in the Attachment 1 of this permit.

5.6 General Recordkeeping Requirements

5.6.1 Emission Records

The Permittee shall maintain records of the following items for the source to demonstrate compliance with Condition 5.5.1, pursuant to Section 39.5(7)(b) of the Act:

Total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions) of this permit.

5.6.2 Retention and Availability of Records

- a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.
- b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the source with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

5.7.2 Annual Emissions Report

The annual emissions report required pursuant to Condition 9.7 shall contain emissions information for the previous calendar year.

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating Emissions

Compliance with the source-wide emission limits specified in Condition 5.5.1 shall be based on the recordkeeping and reporting requirements of Conditions 5.6 and 5.7, and compliance procedures in Section 7 (Unit Specific Conditions) of this permit.

6.0 EMISSIONS REDUCTION MARKET SYSTEM (ERMS)

6.1 Description of ERMS

The ERMS is a "cap and trade" market system for major stationary sources located in the Chicago ozone nonattainment area. It is designed to reduce VOM emissions from stationary sources to contribute to reasonable further progress toward attainment, as required by Section 182(c) of the CAA.

The ERMS addresses VOM emissions during a seasonal allotment period from May 1 through September 30. Participating sources must hold "allotment trading units" (ATUs) for their actual seasonal VOM emissions. Each year participating sources are issued ATUs based on allotments set in the sources' CAAPP permits. These allotments are established from historical VOM emissions or "baseline emissions" lowered to provide the emissions reductions from stationary sources required for reasonable further progress.

By December 31 of each year, the end of the reconciliation period following the seasonal allotment period, each source shall have sufficient ATUs in its transaction account to cover its actual VOM emissions during the preceding season. A transaction account's balance as of December 31 will include any valid ATU transfer agreements entered into as of December 31 of the given year, provided such agreements are promptly submitted to the Illinois EPA for entry into the transaction account database. The Illinois EPA will then retire ATUs in sources' transaction accounts in amounts equivalent to their seasonal emissions. When a source does not appear to have sufficient ATUs in its transaction account, the Illinois EPA will issue a notice to the source to begin the process for Emissions Excursion Compensation.

In addition to receiving ATUs pursuant to their allotments, participating sources may also obtain ATUs from the market, including ATUs bought from other participating sources and general participants in the ERMS that hold ATUs (35 IAC 205.630) and ATUs issued by the Illinois EPA as a consequence of VOM emissions reductions from an Emissions Reduction Generator or an Intersector Transaction (35 IAC 205.500 and 35 IAC 205.510). During the reconciliation period, sources may also buy ATUs from a secondary reserve of ATUs managed by the Illinois EPA, the "Alternative Compliance Market Account" (ACMA) (35 IAC 205.710). Sources may also transfer or sell the ATUs that they hold to other sources or participants (35 IAC 205.630).

6.2 Applicability

This source is considered a "participating source" for purposes of the ERMS, 35 IAC Part 205.

6.3 Obligation to Hold Allotment Trading Units (ATUs)

- a. Pursuant to 35 IAC 205.150(c)(1) and 35 IAC 205.720, and as further addressed by Condition 6.8, as of December 31 of each year, this source shall hold ATUs in its account in an amount not less than the ATU equivalent of its VOM emissions during the preceding seasonal allotment period (May 1 - September 30), not including VOM emissions from the following, or the source shall be subject to "emissions excursion compensation," as described in Condition 6.5.
 - i. VOM emissions from insignificant emission units and activities as identified in Section 3 of this permit, in accordance with 35 IAC 205.220;
 - ii. Excess VOM emissions associated with startup, malfunction, or breakdown of an emission unit as authorized in Section 7.0 of this permit, in accordance with 35 IAC 205.225;
 - iii. Excess VOM emissions to the extent allowed by a Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3);
 - iv. Excess VOM emissions that are a consequence of an emergency as approved by the Illinois EPA, pursuant to 35 IAC 205.750; and
 - v. VOM emissions from certain new and modified emission units as addressed by Condition 6.8(b), if applicable, in accordance with 35 IAC 205.320(f).
- b. Notwithstanding the above condition, in accordance with 35 IAC 205.150(c)(2), if a source commences operation of a major modification, pursuant to 35 IAC Part 203, the source shall hold ATUs in an amount not less than 1.3 times its seasonal VOM emissions attributable to such major modification during the seasonal allotment period, determined in accordance with the construction permit for such major modification or applicable provisions in Section 7.0 of this permit.

6.4 Market Transactions

- a. The source shall apply to the Illinois EPA for and obtain authorization for a Transaction Account prior to conducting any market transactions, as specified at 35 IAC 205.610(a).
- b. The Permittee shall promptly submit to the Illinois EPA any revisions to the information submitted for its Transaction Account, pursuant to 35 IAC 205.610(b).

- c. The source shall have at least one account officer designated for its Transaction Account, pursuant to 35 IAC 205.620(a).
- d. Any transfer of ATUs to or from the source from another source or general participant must be authorized by a qualified Account Officer designated by the source and approved by the Illinois EPA, in accordance with 35 IAC 205.620, and the transfer must be submitted to the Illinois EPA for entry into the Transaction Account database.

6.5 Emissions Excursion Compensation

Pursuant to 35 IAC 205.720, if the source fails to hold ATUs in accordance with Condition 6.3, it shall provide emissions excursion compensation in accordance with the following:

- a. Upon receipt of an Excursion Compensation Notice issued by the Illinois EPA, the source shall purchase ATUs from the ACMA in the amount specified by the notice, as follows:
 - i. The purchase of ATUs shall be in an amount equivalent to 1.2 times the emissions excursion; or
 - ii. If the source had an emissions excursion for the seasonal allotment period immediately before the period for the present emissions excursion, the source shall purchase ATUs in an amount equivalent to 1.5 times the emissions excursion.
- b. If requested in accordance with paragraph (c) below or in the event that the ACMA balance is not adequate to cover the total emissions excursion amount, the Illinois EPA will deduct ATUs equivalent to the specified amount or any remaining portion thereof from the ATUs to be issued to the source for the next seasonal allotment period.
- c. Pursuant to 35 IAC 205.720(c), within 15 days after receipt of an Excursion Compensation Notice, the owner or operator may request that ATUs equivalent to the amount specified be deducted from the source's next seasonal allotment by the Illinois EPA, rather than purchased from the ACMA.

6.6 Quantification of Seasonal VOM Emissions

- a. The methods and procedures specified in Sections 5 and 7 of this permit for determining VOM emissions and compliance with VOM emission limitations shall be used for determining seasonal VOM emissions for purposes of the ERMS, with the following exceptions [35 IAC 205.315(b)]:

No exceptions

- b. The Permittee shall report emergency conditions at the source to the Illinois EPA, in accordance with 35 IAC 205.750, if the Permittee intends to deduct VOM emissions in excess of the technology-based emission rates normally achieved that are attributable to the emergency from the source's seasonal VOM emissions for purposes of the ERMS. These reports shall include the information specified by 35 IAC 205.750(a), and shall be submitted in accordance with the following:
 - i. An initial emergency conditions report within two days after the time when such excess emissions occurred due to the emergency; and
 - ii. A final emergency conditions report, if needed to supplement the initial report, within 10 days after the conclusion of the emergency.

6.7 Annual Account Reporting

- a. For each year in which the source is operational, the Permittee shall submit, as a component of its Annual Emissions Report, seasonal VOM emissions information to the Illinois EPA for the seasonal allotment period. This report shall include the following information [35 IAC 205.300]:
 - i. Actual seasonal emissions of VOM from the source;
 - ii. A description of the methods and practices used to determine VOM emissions, as required by this permit, including any supporting documentation and calculations;
 - iii. A detailed description of any monitoring methods that differ from the methods specified in this permit, as provided in 35 IAC 205.337;
 - iv. If a source has experienced an emergency, as provided in 35 IAC 205.750, the report shall reference the associated emergency conditions report that has been approved by the Illinois EPA;
 - v. If a source's baseline emissions have been adjusted due to a Variance, Consent Order, or CAAPP permit Compliance Schedule, as provided for in 35 IAC 205.320(e)(3), the report shall provide documentation quantifying the excess VOM emissions during the season that were allowed by the Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3); and

- vi. If a source is operating a new or modified emission unit for which three years of operational data is not yet available, as specified in 35 IAC 205.320(f), the report shall specify seasonal VOM emissions attributable to the new emission unit or the modification of the emission unit.
- b. This report shall be submitted by November 30 - of each year, for the preceding seasonal allotment period.

6.8 Allotment of ATUs to the Source

- a.
 - i. The allotment of ATUs to this source is 871 ATUs per seasonal allotment period.
 - ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 98.8589 tons.
 - A. This determination includes the use of 1994 and 1997 as baseline seasons. This determination includes use of the 1997 season as a substitute for the 1995 and 1996 seasons due to non-representative conditions in those seasons as allowed by 35 IAC 205.320(a).
 - B. This determination also includes adjustment to actual emissions to account for voluntary over-compliance at the source, e.g., the baseline emissions recognize 6.18 tons of voluntary over compliance from changes to the practices for cleaning solvents, pursuant to 35 IAC 205.320(d) as further addressed in Section 7 of this permit.
 - iii. The source's allotment reflects 88% of the baseline emissions (12% reduction), except for the VOM emissions from specific emission units excluded from such reduction, pursuant to 35 IAC 205.405, including units complying with MACT or using BAT, as identified in Condition 6.10 of this permit.
 - iv. ATUs will be issued to the source's Transaction Account by the Illinois EPA annually. These ATUs will be valid for the seasonal allotment period following issuance and, if not retired in this season, the next seasonal allotment period.
 - v. Condition 6.3(a) becomes effective beginning in the seasonal allotment period following the initial issuance of ATUs by the Illinois EPA into the Transaction Account for the source.

b. Contingent Allotments for New or Modified Emission Units

The source was not issued a construction permit prior to January 1, 1998 for the following new or modified emission units:

Emission Unit	Construction Permit No.	Date Issued
Press Line 9	02040076	06/02
Line 11	99070022	12/99
Planeta Press	99070022	12/99
Lab Coater	99070022	12/99

In accordance with 35 IAC Part 205, for the above referenced emission units, the source is required to hold the appropriate amount of ATUs for these emission units.

c. Notwithstanding the above, part or all of the above ATUs will not be issued to the source in circumstances as set forth in 35 IAC Part 205, including:

- i. Transfer of ATUs by the source to another participant or the ACMA, in accordance with 35 IAC 205.630;
- ii. Deduction of ATUs as a consequence of emissions excursion compensation, in accordance with 35 IAC 205.720; and
- iii. Transfer of ATUs to the ACMA, as a consequence of shutdown of the source, in accordance with 35 IAC 205.410.

6.9 Recordkeeping for ERMS

The Permittee shall maintain copies of the following documents as its Compliance Master File for purposes of the ERMS [35 IAC 205.700(a)]:

- a. Seasonal component of the Annual Emissions Report;
- b. Information on actual VOM emissions, as specified in detail in Sections 5 and 7 of this permit and Condition 6.6(a); and
- c. Any transfer agreements for the purchase or sale of ATUs and other documentation associated with the transfer of ATUs.

6.10 Exclusions from Further Reductions

- a. VOM emissions from the following emission units shall be excluded from the VOM emissions reductions requirements specified in 35 IAC 205.400(c) and (e) as long as such

emission units continue to satisfy the following [35 IAC 205.405(a)]:

- i. Emission units that comply with any NESHAP or MACT standard promulgated pursuant to the CAA;
- ii. Direct combustion emission units designed and used for comfort heating purposes, fuel combustion emission units, and internal combustion engines; and
- iii. An emission unit for which a LAER demonstration has been approved by the Illinois EPA on or after November 15, 1990.

The source has demonstrated in its ERMS application and the Illinois EPA has determined that the following emission units qualify for exclusion from further reductions because they meet the criteria as indicated above [35 IAC 205.405(a) and (c)]:

Fuel Combustion Emission Units (All Natural Gas-Fired Combustion Units of Group 4)

- b. VOM emissions from emission units using BAT for controlling VOM emissions shall not be subject to the VOM emissions reductions requirement specified in 35 IAC 205.400(c) or (e) as long as such emission unit continues to use such BAT [35 IAC 205.405(b)].

The source has demonstrated in its ERMS application and the Illinois EPA has determined that the following emission units qualify for exclusion from further reductions because these emission units use BAT for controlling VOM emissions as indicated above [35 IAC 205.405(b) and (c)]:

None

7.0 UNIT SPECIFIC CONDITIONS

7.1 Group 1: Can Coating Lines - Sheet Base Coat

7.1.1 Description

The sheets are fed into the roll coater for an application of either a protective interior or decorative exterior coating. The coating is applied through direct contact between the sheet and roll coater. The sheets move to an oven where the determined temperature and residence time cures the coating to the metal sheets. Once the protective and decorative coatings have been applied, the sheets are moved to one of five lithographic press lines where they receive the decorative inks and protective varnish coating.

7.1.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Equipment	Description/Dates of Construction	Emission Control Equipment
Group 1	Can Coating Lines	Three Coating Lines (C1, C2, C10) Comprised of three Base Roll Coaters and three Natural Gas-Fired Ovens (See Section 7.4 for Ovens) Date of Construction: C1 - 1967 C2 - 1973 C10 - 2003	Permanent Total Enclosure and Regenerative Thermal Oxidizer

7.1.3 Applicability Provisions and Applicable Regulations

- a. An "affected coating line" for the purpose of these unit specific conditions is a can sheet coating operation that includes roll coater operated in the permanent total enclosure and controlled by the Regenerative Thermal Oxidizer.
- b. An affected coating line at the source is subject to limitations of 35 IAC 218.207 (h) (2) for can coating, which provides that the coating line shall be equipped with a capture system and control device that provide 75 percent reduction in the overall emissions of VOM from the coating line and the control device has a 90 percent efficiency.
- c.
 - i. Clean-up operations performed on each coating line are subject to one of the following

limitations of 35 IAC Part 218, Subpart G:
Use of Organic Material:

- A. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission unit, except the following exception: If no odor nuisance exists this limitation shall apply only to photochemically reactive materials; or
 - B. Emissions of organic material in excess of those permitted by 35 IAC 218.301 are allowable if such emissions are controlled by a flame, thermal or catalytic incineration so as either to reduce such emissions 10 ppm equivalent methane (molecular weight 16) or less, or to convert 85 percent of the hydrocarbons to carbon dioxide and water.
- ii. These limits do not apply to solvents used as coating diluents (thinners) that are treated as an integral part of coating application and regulated by 35 IAC 218.207(h) (2) [see Condition 7.1.3(b)].
- d. The affected coating line C1 is subject to 35 IAC 212.322(b) (1), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced prior to April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 (See also Attachment 1) [35 IAC 212.322(a)].

- e. The affected coating lines C2 and C10 are subject to 35 IAC 212.321(b) (1), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates

specified in subsection (c) of 35 IAC 212.321 (See also Attachment 1) [35 IAC 212.321(a)].

- f. The affected coating lines are subject to requirements of 40 CFR Part 63 Subpart KKKK, "National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Cans". For an existing affected source, the compliance date is established at November 13, 2006. By this date, the Permittee shall submit revisions to the Title V permit by addressing method(s) of compliance with Subpart KKKK and compliance with all other applicable requirements established by Subpart KKKK.

7.1.4 Non-Applicability of Regulations of Concern

- a. Coating operations performed on the affected coating line and subject to limitations of 35 IAC 218.204 are excluded from requirements of 35 IAC Part 218, Subpart G: Use of Organic Material, pursuant to 35 IAC 218.209, Exemption From General Rule on Use of Organic Material.
- b. The affected coating line is not subject to 40 CFR 60 Subpart WW "Standards of Performance for the Beverage Can Surface Coating Industry", because no beverage can coating performed at this location.
- c. Clean-up operations performed for the purpose of coating operations are not subject to 35 IAC 218, Subpart TT "Other Emission Units" because the facility-wide Maximum Theoretical Emissions (MTE) from clean-up solvents used for coating operations are less than 100 tons/year.

7.1.5 Operational and Production Limits and Work Practices

- a. Thermal oxidizer shall be in operation at all times that the associated emission unit(s) is in operation and emitting VOM. The oxidizer shall not be seasonally shut down as would be allowed in 35 IAC 218.107.
- b. The permanent total enclosure and an oxidizer control system shall be operated in a manner consistent to good air pollution control practices and operating requirements established in 35 IAC 218, Appendix B, Procedure T "Criteria for and Verification of a Permanent or Temporary Total Enclosure".
- c. The Permittee shall, in accordance with manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance of the thermal oxidizer such that oxidizer be kept in proper working

condition and not cause violation of the Environmental Protection Act or regulations promulgated therein.

- d. i. The afterburner combustion chamber shall be preheated to at least the manufacturer's recommended temperature but not lower than 1400°F before the can coating process is begun. This temperature shall be maintained all time during coating operations.
- ii. The afterburner shall be equipped with a continuous temperature indicator and strip chart recorder or disk storage for the combustion chamber temperature.
- e. The permanent total enclosure installed for the affected coating line shall meet the requirements of permanent total enclosure, which are established in 35 IAC 218, Appendix B, Procedure T. As a result, the capture efficiency of VOM for the affected coating line is assumed to be 100 percent.
- f. The permanent total enclosure and the regenerative thermal oxidizer control system shall be operated in a manner consistent with good air pollution control practices.
- g. The RTO, in conjunction with the permanent total enclosure, shall be operated to achieve at least 95% overall control (combination of capture and control) of the volatile organic material.

Note: This requirement is more stringent than the control requirements specified by Condition 7.1.3(b).

7.1.6 Emission Limitations

- a. Emissions from the affected coating line C10 shall not exceed the following limits:

<u>Pollutant</u>	<u>(Ton/Month)</u>	<u>(Ton/Year)</u>
VOM	3.0	20.9

- b. i. Emissions of individual hazardous air pollutants (HAPs) from the affected coating line shall not exceed 1.2 tons/month and 9.9 tons/year.
- ii. Emissions of all hazardous air pollutants (HAPs) combined, from the affected coating line, shall not exceed 3.0 tons/month and 20.9 tons/year.

- c. The above limitations were established in Permit #02100030, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].
- d. Compliance with annual limits in Conditions 7.1.6 shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

7.1.7 Testing Requirements

Upon request from the Illinois EPA or USEPA the Permittee shall conduct tests in accordance with procedures of 35 IAC 218.105(d), (e) and (f) to measure the overall control and performance of the RTO controlling the affected coating lines. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing.

7.1.8 Monitoring Requirements

- a. Pursuant to 35 IAC 218.105(d) (2) (A) (i), the thermal oxidizer shall be equipped with a USEPA approved continuous monitoring device which is installed, calibrated, maintained, and operated according to vendor specifications at all times the afterburner is in use. This monitoring equipment shall monitor the combustion chamber temperature of each afterburner.

- b. Compliance Assurance Monitoring (CAM):

These requirements are valid only through compliance date - November 13, 2006 - of 40 CFR Part 63, Subpart KKKK. After this, CAM requirements are not applicable any more to this source, pursuant to 40 CFR 64.2(b) (1) (i).

The regenerative thermal oxidizer is subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources. The Permittee shall comply with the monitoring requirements of the Compliance Assurance Monitoring (CAM) Plan described in Attachment 4 pursuant to 40 CFR Part 64 as submitted in the Permittee's CAM plan application. The Permittee shall maintain records of the monitoring data, monitor performance data, corrective actions taken, monitoring equipment maintenance, and other supporting information, as required by 40 CFR 64.9(b) (1).

7.1.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for the affected coating line to demonstrate compliance with conditions of this permit, pursuant to Section 39.5(7)(b) of the Act:

- a. Pursuant to 35 IAC 218.211(e)(2), the Permittee shall collect and record all of the following information each day for each coating line and maintain the information at the source for a period of three years:
 - i. Control device monitoring data;
 - ii. A log of operating time for the capture system, regenerative thermal oxidizer, monitoring equipment and the associated coating line; and
 - iii. A maintenance log for the capture system, RTO and monitoring equipment detailing all routine and non-routine maintenance performed including dates and duration of any outages.
- b. Coating Solvents:
 - i. The VOM content of each coating, as applied, in units of lb VOM/gal of coating solids;
 - ii. Volume of solids applied for each coating per calendar month, in the units of gal solids/month; and
 - iii. Actual coating VOM consumption per calendar month, in units of lb VOM/month.
- c. Clean-up Solvents:
 - i. The total volume of clean-up solvent dispensed for use on affected coating lines 1 and 2 per calendar month, in the units of gal/month;
 - ii. The VOM content of clean-up solvent used on affected coating lines, in lb VOM/gal solvent blend, as determined by supplier;
 - iii. Total volume of waste solvent generated by affected coating lines per calendar month, in the units of gal/month; and
 - iv. The VOM content of waste solvent generated by affected coating lines in lb VOM/gal waste

solvent, as determined by disposal company waste profile analyses.

- d. HAP percentage in the VOM, determined from monthly production data; and
- e. Total VOM and HAP emissions in tons/month and tons/year from all affected coating lines calculated based on the recordkeeping requirements and compliance procedures established in Condition 7.1.12.

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with applicable requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

Pursuant to 35 IAC 218.211(e)(3), the Permittee shall notify the Illinois EPA in the following instances:

- a. Any record showing violation of 35 IAC 218.207 and Conditions 7.1.3(b) and 7.1.6 within 30 days of such an occurrence;
- b. At least 30 calendar days before changing the method of compliance from 35 IAC 218.207 to 35 IAC 218.204 or 205, the Permittee shall comply with all requirements of 35 IAC 218.211(c)(1) and (d)(1).

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected coating line without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

Usage of coating and clean-up solvents on the affected coating lines with various VOM contents provided that the source wide emission limitations in Condition 5.5.1 are not exceeded and the affected coating lines remain in compliance with Condition 7.1.3(b).

7.1.12 Compliance Procedures

- a. Compliance of the affected coating line with VOM emission limitations in Condition 5.5.1 shall be based on the recordkeeping requirements in Condition 7.1.9 and by use of the formula listed below:

Combined monthly VOM/HAP emissions from affected coating lines (and separate VOM/HAP emissions for Line C10) shall be calculated based on the following equations:

- i. Total monthly VOM/HAP usage for coating lines shall be calculated by use of the following equation:

$$U = \left[\sum_{i=1}^n (V_{C(i)} \times C_{(i)}) \right] + \left[(V_{(s)} \times S) - (V_{(w)} \times W) \right]$$

Where:

- U = Total VOM/HAP usage (coating and clean-up solvents) for the calendar month in units of lb/month
- C = The VOM/HAP content of each coating, as applied, in units of lb VOM/gal solids
- V_C = Volume of solids applied for each coating per calendar month in units of gal coating solids/month
- S = The VOM/HAP content of the clean-up solvent in units of lb VOM(HAP)/gal of solvent blend
- V_S = Total volume of clean-up solvent dispensed for use on the affected coating lines for the calendar month in units of gal/mo
- W = The VOM/HAP content of waste solvent generated by the affected coating lines in units of lb VOM(HAP)/gal as measured in accordance with Condition 7.1.9(c) (iv)
- V_W = Total volume of waste solvent generated by the affected coating lines for the calendar month in units of gal/mo

- ii. Total monthly VOM/HAP emissions for coating lines shall be calculated by use of the following equation:

$$E = U \times (1-F)$$

Where:

E = Total VOM/HAP emissions per calendar month in units of lb VOM(HAP)/mo

U = Total VOM(HAP) consumption per calendar month in units of lb VOM(HAP)/mo

F = Fraction, by weight, of VOM/HAP emissions from the surface coating reduced or prevented from being emitted to the ambient air. This fraction is the overall efficiency of the capture system and control device, and is equal to the destruction efficiency of the individual RTO controlling the affected coating line, as measured in the most recent stack test.

- iii. Total monthly HAP emissions for the affected coating line shall be calculated by use of the following equation:

$$E_h = U \times C_h \times (1-F)$$

where:

E_h = HAP emissions (lbs/mo)

U = Total VOM consumption per calendar month in units of lb VOM/mo

C_h = HAP percentage in the VOM, determined from monthly production data

F = Fraction, by weight, of VOM emissions from the surface coating reduced or prevented from being emitted to the ambient air. This fraction is the overall efficiency of the capture system and control device, and is equal to the destruction efficiency of the RTO controlling the affected coating line, as measured in the most recent stack test.

- b. Compliance with the overall control efficiency requirement under Condition 7.1.3(b) shall be based on the latest measurement of destruction efficiency of the RTO controlling coating lines, and the latest verification test of the permanent total enclosure.
- c. Compliance with the particulate matter limitations of Condition 7.1.3(d) and (e) is assured and achieved by the work practices inherent in operation of the affected coating lines.

7.2 Group 2: Sheet Fed Offset Lithographic Printing/Overvarnish Lines

7.2.1 Description

Once the protective and decorative coatings have been applied, the sheets are moved to one of seven sheet-fed lithographic printing lines (either UV conventional) where they receive the decorative inks and/or a protective varnish coating. The facility has two conventional 2-color printing press lines, three 2-color UV press lines, one 4-color UV press line, and one 6-color UV press line. Once the printed sheet has received all appropriate images, the sheets then move through a varnish unit that may apply a protective coating over the newly printed sheets. The sheets then move to a drying oven where the determined temperature and residence time cures the decorative ink and varnish to the metal sheet.

7.2.2 List of Emission Equipment and Pollution Control Equipment

Emission Unit	Equipment	Description	Emission Control Equipment
Group 2	Seven Lines	Press Lines ##3,4 with Varnish Coaters PC-3, 4 Date of Construction: #3 & #4 - 1973	Permanent Total Enclosure and Regenerative Thermal Oxidizer (RTO)
		Five Press Lines (##5 through 9) with Varnish Coaters. Date of Construction: #5 - 1973 #6 - 1982 #7 - 1990 #8 - 1999 #9 - 2002	None

7.2.3 Applicability Provisions and Applicable Regulations

- a. An "affected printing line" for the purpose of these unit specific conditions, is a printing/coating operation described in Conditions 7.2.1 and 7.2.2.
- b. Each affected printing line at the source is subject to limitations of 35 IAC 218.407(a) (3) (A) for as-applied fountain solution, which provides that:

No owner or operator of any sheet-fed offset lithographic printing line shall apply fountain

solution with the VOM content exceeding 5.0 percent, by volume.

- c. Each affected printing line at the source is subject to limitations of 35 IAC 218.407(a) (4) (A) or (B) for as-used cleaning solution, which provides that:
 - i. No owner or operator of any lithographic printing line shall apply the as-used cleaning solution with VOM content exceeding 30 percent, by weight.
 - ii. No owner or operator of any lithographic printing line shall apply the as-used cleaning solution with a composite vapor pressure exceeding 10 mmHg at 20° C (68° F).
- d. Each affected printing line at the source is subject to requirements of 35 IAC 218.407(a) (5) for keeping cleaning materials, which provides that:

The VOM containing cleaning materials, including used cleaning towels associated with any lithographic printing line shall be kept, stored and disposed of in closed containers.
- e. Each varnish coater at the affected printing line is subject to limitations of 35 IAC 218.204(b) (1) (B) for can coating overvarnish operations, which provides that:
 - i. No owner or operator of an affected overvarnish coater shall apply at any time any coating in which the VOM content exceeds the following emission limitations. The following emission limitation is expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied at each coating applicator:

$\frac{\text{kg/l}}{0.34}$	$\frac{\text{lb/gal}}{2.8}$
----------------------------	-----------------------------
 - ii. Compounds, which are specifically exempted from the definition of VOM, should be treated as water for the purpose of calculating the "less water" part of the coating composites.
- f. The varnish coaters for Lines 3 and 4 are subject to limitations of 35 IAC 218.207(h) (2) for can coating, which provides that the coating line shall be equipped with a capture system and control device that provide 75 percent reduction in the overall

emissions of VOM from the coating line and the control device has a 90 percent efficiency.

- g. i. Clean-up operations performed on each varnish coater are subject to the following limitations of 35 IAC 218.301:

No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission unit, except the following exception: If no odor nuisance exists this limitation shall apply only to photochemically reactive materials.

- ii. These limits do not apply to solvents used as overvarnish coating diluents that are treated as an integral part of coating application and regulated by 35 IAC 218.204(b) (1) (B) [see Condition 7.2.3(e)].

- h. Each affected printing line is subject to 35 IAC 212.321(b) (1), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (See also Attachment 1) [35 IAC 212.321(a)].

7.2.4 Non-Applicability of Regulations of Concern

- a. The affected printing lines are not subject to 40 CFR 60, Part WW "Standards of Performance for the Beverage Can Surface Coating Industry" because no beverage can coating is performed at this location.
- b. Clean-up operations performed for the purpose of overvarnish coating operations are not subject to 35 IAC 218, Subpart TT "Other Emission Units" because the facility-wide Maximum Theoretical Emissions (MTE) from clean-up solvents used for coating operations are less than 100 tons/year.

7.2.5 Operational and Production Limits and Work Practices

- a. Thermal oxidizer shall be in operation at all times that the associated emission unit(s) is in operation and emitting VOM. The oxidizer shall not be

seasonally shut down as would be allowed in 35 IAC 218.107.

- b. The permanent total enclosure and an oxidizer control system shall be operated in a manner consistent to good air pollution control practices and operating requirements established in 35 IAC 218, Appendix B, Procedure T "Criteria for and Verification of a Permanent or Temporary Total Enclosure".
- c. The Permittee shall, in accordance with manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance of the thermal oxidizer such that oxidizer be kept in proper working condition and not cause violation of the Environmental Protection Act or regulations promulgated therein.
- d.
 - i. The afterburner combustion chamber shall be preheated to at least the manufacturer's recommended temperature but not lower than 1400°F before the can coating process is begun. This temperature shall be maintained all time during coating operations.
 - ii. The afterburner shall be equipped with a continuous temperature indicator and strip chart recorder or disk storage for the combustion chamber temperature.
- e. The permanent total enclosure installed for the affected coating line shall meet the requirements of permanent total enclosure, which are established in 35 IAC 218, Appendix B, Procedure T. As a result, the capture efficiency of VOM for the affected coating line is assumed to be 100 percent.
- f. The permanent total enclosure and the regenerative thermal oxidizer control system shall be operated in a manner consistent with good air pollution control practices.
- g. The Permittee shall implement a standard operating procedure for varnish coaters wash-up that limits the quantity of cleaning solvent dispensed for wash-up to less than one gallon of VOM per varnish applicator per hour.
- h. Wash up coating applicators only when the permanent total enclosure and regenerative thermal oxidizer are operating and VOM emissions are reduced by at least 85%, pursuant to 35 IAC 218.302(a).

7.2.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected printing lines are subject to the following:

- a. Emissions and operation of the line #7 shall not exceed the following limits:

Total VOM Usage		VOM Emissions	
<u>(T/Mo)</u>	<u>(T/Yr)</u>	<u>(T/Mo)</u>	<u>(T/Yr)</u>
5.0	25.0	5.0	25.0

The above limitations contain revisions to previously issued construction permit #881200073. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this construction permit, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification. These limits continue to ensure that the construction and/or modification addressed in this construction permit does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this construction permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, allowable VOM emissions are increased and established at 5 tons/mo and 25 tons/year [T1R].

- b. Emissions from the affected Line #8 shall not exceed the following limits:

VOM Emissions	
<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
4.9	24.3

The above limitations were established in Permit #99070022, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

- c. Emissions from the affected line #9 shall not exceed the following limits:

VOM Emissions	
<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
2.0	15.0

The above limitations were established in Permit #02040076, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

- d. Emissions from Lines 3 and 4 shall not exceed the following limits:

VOM Emissions	
<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
2.9	14.1

The above limitations were established in Permit #99070022, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

- e. Compliance with annual limits mentioned above shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

7.2.7 Testing Requirements

- a. Upon request from the Illinois EPA or USEPA the Permittee shall conduct tests in accordance with procedures of 35 IAC 218.105(d), (e) and (f) to measure the overall control and performance of the RTO controlling the affected printing line. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing.
- b. Upon request of the Illinois EPA or USEPA, testing to demonstrate compliance with the VOM content limitations for fountain/cleaning solution and overvarnish coating, and to determine the VOM content of fountain solutions, fountain solution additives, cleaning solvents, cleaning solutions, overvarnish

coatings and inks, shall be conducted, as follows [35 IAC 218.105(a), 218.211(a), and Section 39.5(7)(b) of the Act]:

- i. The applicable test methods and procedures specified in 35 IAC 218.105(a) shall be used, provided, however, Method 24 shall be used to demonstrate compliance; or
 - ii. The manufacturer's specifications for VOM content for fountain solution additives, cleaning solvents, varnish coatings and inks may be used if such manufacturer's specifications are based on results of tests of the VOM content conducted in accordance with methods specified in 35 IAC 218.105(a), provided, however, Method 24 shall be used to determine compliance.
- c. Upon request of the Illinois EPA or USEPA, testing to demonstrate compliance with 35 IAC 218.407(a)(4)(B) of the VOM composite partial vapor pressure of the as-used cleaning solution shall be conducted, as follows [35 IAC 218.110 and Section 39.5(7)(b) of the Act]:
- i. If the organic material or solvent consists of only a single compound, the vapor pressure shall be determined by ASTM Method D2879-86 (incorporated by reference in Section 218.112 of this Part) or the vapor pressure may be obtained from a publication such as: Boublik, T., V. Fried and E. Hala, "The Vapor Pressure of Pure Substances," Elsevier Scientific Publishing Co., New York (1973); Perry's Chemical Engineer's Handbook, McGraw-Hill Book Company (1984); CRC Handbook of Chemistry and Physics, Chemical Rubber Publishing Company (1986-87); and Lange's Handbook of Chemistry, John A. Dean, editor, McGraw-Hill Book Company (1985);
 - ii. If the organic material or solvent is in a mixture made up of both organic material compounds and compounds which are not organic material, the vapor pressure shall be determined by the following equation:

$$P_{vom} = \frac{\sum_{i=1}^n P_i X_i}{\sum_{i=1}^n X_i}$$

Where:

P_{vom} = Total vapor pressure of the portion of the mixture which is composed of organic material;

n = Number of organic material components in the mixture;

i = Subscript denoting an individual component;

P_i = Vapor pressure of an organic material component determined in accordance with Condition 7.2.7(a);

X_i = Mole fraction of the organic material component of the total mixture.

- iii. If the organic material or solvent is in a mixture made up of only organic material compounds, the vapor pressure shall be determined by ASTM Method D2879-86 or by the above equation.

7.2.8 Monitoring Requirements

- a. Pursuant to 35 IAC 218.105(d)(2)(A)(i), the thermal oxidizer shall be equipped with a USEPA approved continuous monitoring device which is installed, calibrated, maintained, and operated according to vendor specifications at all times the afterburner is in use. This monitoring equipment shall monitor the combustion chamber temperature of each afterburner.
- b. Compliance Assurance Monitoring (CAM):

These requirements are valid only through compliance date - November 13, 2006 - of 40 CFR Part 63, Subpart KKKK. After this, CAM requirements are not applicable any more to this source, pursuant to 40 CFR 64.2(b)(1)(i).

The regenerative thermal oxidizer is subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources. The Permittee shall comply with the monitoring requirements of the Compliance Assurance Monitoring (CAM) Plan described in Attachment 4 pursuant to 40 CFR Part 64 as submitted in the Permittee's CAM plan application. The Permittee shall maintain records of the monitoring data, monitor performance data, corrective actions taken, monitoring equipment maintenance, and

other supporting information, as required by 40 CFR 64.9(b) (1) .

c. Fountain Solution

Test the fountain solution VOM content by using a hydrometer with an accuracy of 0.5% in accordance with 35 IAC 218.410(b) (1) (B) . Readings shall be made for each new batch of fountain solution prepared and on a daily basis for existing batches of fountain solution contained in each printing press reservoir.

d. Cleaning Solution

- i. When relying on the VOM content of the cleaning solution to comply with 35 IAC 218.407(a) (4) (A), the Permittee must keep records of the supplier VOC data sheets for each pre-blended cleaning solvent used on the lithographic printing presses.
- ii. When relying on the vapor pressure of the cleaning solution to comply with 35 IAC 218.407(a) (4) (B), the Permittee must keep records of the type and vapor pressure of each cleaning solution constituent used on the lithographic printing presses.

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected boilers to demonstrate compliance with Condition 5.5.1 pursuant to Section 39.5(7) (b) of the Act:

The Permittee shall maintain records of the following items for the affected printing lines to demonstrate compliance with conditions of this permit, pursuant to Section 39.5(7) (b) of the Act:

a. Fountain Solution

The Permittee shall collect and record the following information for all lithographic printing lines at the source [35 IAC 218.141(c)]:

- i. Total additions of alcohol to fountain solution (gal/mo).
- ii. Total usage of fountain solution concentrates (gal/mo).
- iii. Fountain solution concentrate VOM content (% by volume).

b. Cleaning Solution

The Permittee shall collect and record the following information for all lithographic printing lines at the source [35 IAC 218.411(d)]:

- i. The pre-blended cleaning solution VOM content, expressed as lb VOM/gal solution.
- ii. Volume (gal/mo) and vapor pressure (mmHg) of each solvent component, water, or non-VOM constituent contained in cleaning solutions purchased for use on the affected printing lines.
- iii. The composite VOM vapor (mmHg) pressure of pre-blended cleaning solutions determined.
- iv. The Permittee shall record the date, time and duration of scheduled inspections performed to confirm the proper use of closed containers to control VOM emissions, and any instances of improper use of closed containers, with descriptions of actual practice and corrective action taken, if any.

c. The Permittee shall collect and record the following information on inks and overvarnishes applied on the lithographic printing lines:

- i. Identification and the combined monthly usage of each ink and overvarnish applied on all printing lines.
- ii. Identification and the combined monthly usage of each ink and overvarnish applied on Line #7.
- iii. The VOM content of each overvarnish, expressed both in lb VOM/gal solids and lb VOM/gal coating (minus water and any compounds which are specifically exempt from the definition of VOM), and the solids content expressed as gallons of coating, with supporting information such as supplier VOC data sheets and Method 24 analytical test reports.
- iv. The VOM content of each ink, expressed as lb VOM per pound of ink, accompanied by a copy of supporting information such as supplier VOM data sheets.

- v. The monthly total volume of clean-up solvent dispensed for wash-up of all overvarnish applicators on the lithographic printing lines, expressed as gal/month.
 - vi. The VOM content of clean-up solvent used on the overvarnish applicators, in lb VOM/gal solvent blend, determined by supplier VOM data sheets.
- d. VOM-Containing Waste
 - i. Total monthly quantity of spent fountain solution generated by lithographic printing lines, expressed as gal/mo.
 - ii. Total monthly volume of spent cleaning solutions generated by wash-up of all lithographic printing lines, expressed as gal/mo.
 - iii. Total monthly volume of spent solvent generated by all overvarnish applicators, expressed as gal/mo.
 - iv. The average VOM content of spent printing press cleaning solution, fountain solution, overvarnish clean-up solvent, expressed as lb VOM/gal, determined by disposal company waste profile analyses.
- e. VOM and HAP emissions in tons/month and tons/year from each affected printing line identified in Condition 7.2.2 and emissions shall be calculated based on the recordkeeping requirements and compliance procedures from Condition 7.2.12.

7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with applicable requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant

records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

None

7.2.12 Compliance Procedures

- a. Compliance of the affected printing lines with VOM emission limitations in Condition 7.2.3 shall be based on the recordkeeping requirements in Condition 7.2.9 and by use of equations listed below:

Cleaning Solution

- A. Compliance with the cleaning solution VOM content standard shall be confirmed by review of supplier material safety data sheets for purchased pre-blended solvents.
- B. Compliance with the VOM composite vapor pressure requirements shall be determined in accordance with testing requirements in Condition 7.2.7(b).
- b. Compliance of the affected overvarnish coaters with VOM emission limitations in Condition 7.2.3(e) shall be based on the recordkeeping requirements in Condition 7.2.9 and by use of equations listed below:

$$\text{VOM Coating Content} = V \times D / [1 - W \times D],$$

Where:

V = Percent VOM in the coating (%)

D = Overall coating density (lb/gal)

$$W = \Sigma (w_i / d_i),$$

Where:

w_i = Percent exempt compound i in the coating,

d_i = Overall density of exempt compound i, lb/gal and the summation Σ is applied over water and all exempt compounds i in the coating.

- c. Lines ##3 and 4 (controlled emissions)

$$E_I = \sum_{i=1}^n I_{(i)} \times V_{I(i)} \times [100 - (\text{overall control reduction, \%})] / 100$$

$$E_{FS} = [(F_A \times 6.6) + (F_C \times V_C)] \times [100 - (\text{overall control reduction, \%})] / 100 - (W_{FS} \times V_{WFS})$$

$$E_{OV} = \sum_{i=1}^n OV_{(i)} \times S_{OV(i)} \times V_{OV(i)} \times [100 - (\text{overall control reduction, \%})] / 100$$

$$E_{CS} = (CS \times V_{CS}) \times [100 - (\text{overall control reduction, \%})] / 100 - (W_{CS} \times V_{WCS})$$

$$E_{WS} = (WS \times V_{WS}) \times [100 - (\text{overall control reduction, \%})] / 100 - (W_{WS} \times V_{WWS})$$

$$E_{TOTAL} = E_I + E_{FS} + E_{OV} + E_{CS} + E_{WS}$$

d. Lines ##5 through 9 (uncontrolled emissions)

Note: emissions for lines 7, 8, and 9 shall be calculated separately

$$E_{I(5/9)} = \sum_{i=1}^n I_{(5/9)(i)} \times V_{I(i)}$$

$$E_{OV(5/9)} = \sum_{i=1}^n OV_{(5/9)(i)} \times S_{OV(i)} \times V_{OV(i)}$$

$$E_{FS(5/9)} = E_{FS} \times (I_{(5/9)} / I)$$

$$E_{CS(5/9)} = E_{CS} \times (I_{(5/9)} / I)$$

$$E_{WS(5/9)} = E_{WS} \times (OV_{(5/9)} / OV)$$

$$E_{TOTAL(5/9)} = E_{I(5/9)} + E_{FS(5/9)} + E_{OV(5/9)} + E_{CS(5/9)} + E_{WS(5/9)}$$

Where:

E_I = Monthly emissions from ink VOM (lb VOM/mo)

E_{FS} = Monthly VOM emissions from fountain solution (lb VOM/mo)

E_{OV} = Monthly overvarnish VOM emissions (lb VOM/mo)

E_{CS} = Monthly VOM emissions from printing press cleaning solvents (lb VOM/mo)

E_{WS} = Monthly VOM emissions from overvarnish wash solvents (lb VOM/mo)

E_{TOTAL} = Monthly total VOM emissions from Group 2 (lb VOM/mo)

$E_{I(5/9)}$ = Monthly ink VOM emissions from Lines 5 through 9 (lb VOM/mo)

$E_{OV(5/9)}$ = Monthly overvarnish VOM emissions from Lines 5 through 9 (lb VOM/mo)

$E_{FS(5/9)}$ = Monthly fountain solution VOM emissions from Lines 5 through 9 (lb VOM/mo)

$E_{CS(5/9)}$ = Monthly cleaning solvents VOM emissions from Lines 5 through 9 (lb VOM/mo)

$E_{WS(5/9)}$ = Monthly overvarnish wash solvent VOM emissions from Lines 5 through 9 (lb VOM/mo)

$E_{TOTAL(5/9)}$ = Monthly total VOM emissions from Lines 5 through 9 (lb VOM/mo)

I = Monthly printing ink consumption for all lithographic printing presses (lb/mo)

$I_{(5/9)}$ = Monthly printing ink consumption for Lines 5 through 9 (lb/mo)

V_I = VOM content of printing ink (% by weight)

OV = Monthly consumption of overvarnish for all lithographic printing lines (gal/mo)

$OV_{(5/9)}$ = Monthly consumption of overvarnish for Lines 5 through 9 (gal/mo)

S_{OV} = Solids content of overvarnishes (gal of solids/gal of varnish)

V_{OV} = VOM content of overvarnishes (lb VOM/gal of solids)

FS = Total monthly consumption of fountain solution (gal/mo)

W_{FS} = Total monthly generation of waste fountain solution (gal/mo)

V_{FS} = VOM content of fountain solution (% by volume)

D_{FSVOM} = Density of fountain solution VOM (assumed to be equal to isopropyl alcohol = 6.6 lb/gal)

CS	=	Total monthly cleaning solution usage from all printing lines (gal/mo)
V _{CS}	=	VOM content of cleaning solution (lb VOM/gal)
W _{CS}	=	Monthly combined volume of spent cleaning solution from all printing lines (gal/mo)
VW _{CS}	=	Average VOM content of spent cleaning solution (lb VOM/gal)
WS	=	Total monthly volume of wash solvent used on all overvarnish applicators (gal/mo)
V _{WS}	=	VOM content of overvarnish wash solvent (lb VOM/gal)
W _{WS}	=	Monthly combined generation of spent wash solvent from all overvarnish applicators (gal/mo)
V _{WFS}	=	VOM content of spent fountain solution, expressed as gal/mo
V _{WWS}	=	Average VOM content of spent overvarnish wash solvent (lb VOM/gal)
F _C	=	Total usage of fountain solution concentrate, expressed as gal/mo
V _C	=	Fountain solution concentrate VOM content, expressed as percent by volume
F _A	=	Volume of alcohol added to fountain solution, expressed as gal/mo

7.3 Group 3: Side Seam Spray Coating Lines

7.3.1 Description

The side seam process is performed on eleven lines in the aerosol department and two lines in the oblong department. Each of the thirteen side seam lines has the capability to coat both the inside and outside of the cans. The units weld the side seam of a can and the seam is then coated with a side seam stripe to prevent corrosion.

7.3.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Equipment	Description	Emission Control Equipment
Group 3	Side Seam Spray Coating Lines	Aerosol Department (Lines #1 - 11) Oblong Department (Lines #23 an #25) Date of Construction: #1 - #9 - 1973 #10 - 1995 #11 - 2000 #23 - 1994 #25 - 1992	Filters Filters

7.3.3 Applicability Provisions and Applicable Regulations

- a. An "affected coating line" for the purpose of these unit specific conditions is a coating operation that includes a spray system and curing oven which is used to apply side seam stripe to exterior/interior parts of the can.
- b. Each affected coating line is subject to limitations of 35 IAC 218.204(b) (5) for side seam spray can coating, which provides that:
 - i. No owner or operator of an affected coating line shall apply at any time any coating in which the VOM content exceeds the following emission limitations for the coating as applied to Side Seam Spray Can Coating Products. The following emission limitation is expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied at each coating line:

<u>kg/l</u>	<u>lb/gal</u>
0.66	5.5

- ii. Compounds which are specifically exempted from the definition of VOM should be treated as water for the purpose of calculating the "less water" part of the coating composites.
- c. i. Clean-up operations performed on each coating line are subject to the following limitation of 35 IAC Part 218, Subpart G: Use of Organic Material:

No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission unit, except the following exception: If no odor nuisance exists this limitation shall apply only to photochemically reactive materials.
- ii. These limits do not apply to solvents used as double scraper solvents that are treated as an integral part of coating application and regulated by 35 IAC 218.204(b) (5) (see Condition 7.3.3(b)).
- d. Each affected coating line is subject to 35 IAC 212.321(b) (1), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (See also Attachment 1) [35 IAC 212.321(a)].

7.3.4 Non-Applicability of Regulations of Concern

- a. Coating operations performed on the affected coating line and subject to limitations of 35 IAC 218.204 are not subject to 35 IAC Subpart G: Use of Organic Material, pursuant to 35 IAC 218.209, Exemption From General Rule on Use of Organic Material, which excludes coating operations of the affected coating line from this requirement.
- b. Clean-up operations performed for the purpose of coating operations are not subject to 35 IAC 218, Subpart TT "Other Emission Units" because the facility-wide Maximum Theoretical Emissions (MTE) from clean-up solvents used for coating operations are less than 100 tons/year.

7.3.5 Operational and Production Limits and Work Practices

- a. The Permittee shall operate, maintain, and replace the filters in a manner that assures compliance with the conditions of this section.
- b. The Permittee shall implement a standard operating procedure for coating line wash-up that limits the quantity of cleaning solvent dispensed for wash-up to less than one gallon of VOM per varnish applicator per hour.

7.3.6 Emission Limitations

- a. Total combined emissions and operation of the affected coating Lines #10, 23, and 25 shall not exceed the following limits:

<u>Material</u>	<u>Usage</u>		<u>VOM Emissions</u>	
	<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>	<u>(Lb/Mo)</u>	<u>(T/Yr)</u>
Coating	710	7,100	3,900	19.5
Cleanup Solvents	0.38 (ton)	3.8 (ton)	760	3.8

The above limitations were established in construction permits # 92110053, 94050110, and 95020065, pursuant to 35 IAC Part 203. These limits ensure that construction addressed in the aforementioned permits does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1]. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

- b. Emissions from coating line #11 shall not exceed the following limits:

<u>VOM Emissions</u>	
<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
2.2	10.64

The above limitations were established in Construction Permit #99070022, pursuant to 35 IAC Part 203. These limits ensure that construction addressed in the aforementioned permits does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1]. Compliance with annual limits shall be determined on a monthly basis from the sum of the

data for the current month plus the preceding 11 months (running 12 month total).

7.3.7 Testing Requirements

Testing for VOM content of coatings and other materials shall be performed as follows [35 IAC 218.105(a), 218.211(a), and Section 39.5(7)(b) of the Act]:

Upon reasonable request by the Illinois EPA, the VOM content of specific coatings and cleaning solvents used on the affected coating line shall be determined according to USEPA Reference Method 24 of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a) and 218.211(a).

- a. The VOM content of representative coatings "as applied" on the affected coating line shall be determined according to USEPA Reference Method 24 of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a);
- b. This testing may be performed by the supplier of a material provided that the supplier provides appropriate documentation for such testing to the Permittee and the Permittee's records pursuant to Condition 7.3.9(b) directly reflect the application of such material and separately account for any additions of solvent.

7.3.8 Monitoring Requirements

Monitoring of the VOM content limit of Condition 7.3.3(b) may be achieved by either fulfilling requirements established in Condition 7.3.7 or by keeping appropriate records required in Condition 7.3.9.

7.3.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for the affected coating line to demonstrate compliance with conditions of this permit, pursuant to Section 39.5(7)(b) of the Act:

- a. The identification and monthly consumption of each side seam coating applied on all lines within Group 3, in units of gal/mo.
- b. The identification and monthly consumption of each side seam coating applied on Lines 10, 23, and 25, in units of gal/mo.
- c. The identification and monthly consumption of each side seam coating applied on Line 11, in units of gal/mo.

- d. The combined monthly consumption of clean-up solvent used by all coating lines, in units of gal/mo.
- e. The combined monthly consumption of clean-up solvent used by Lines 10, 23, and 25, in units of gal/mo.
- f. Monthly consumption of clean-up solvent used by Line 11, in units of gal/mo.
- g. The combined monthly quantity of spent solvent generated by clean-up of all side seam coating applicators of Group 3, in units of gal/mo.
- h. The VOM/HAP content of each side seam coating, expressed as both lb VOM/gal coating solids and lb VOM/HAP/gal coating (minus water and any compounds which are specifically exempted from the definition of VOM/HAP), and the solids content expressed as gal solids/gel coating, with supporting information such as supplier VOC/HAP data sheets and Method 24 analytical test reports.
- i. Density of each applied coating and cleanup solvent, in units of lb/gal.
- j. VOM emissions in tons/month and tons/year from Lines #10, 23 and 25 calculated based on the recordkeeping and compliance procedures from Condition 7.3.12.
- k. VOM emissions in tons/month and tons/year from Line 11 calculated based on the recordkeeping requirements and compliance procedures from Condition 7.3.12.
- l. Total VOM and HAP emissions in tons/month and tons/year from all affected coating lines calculated based on the recordkeeping requirements and compliance procedures from Condition 7.3.12.

7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with applicable requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant

records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected coating line without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

Usage of coatings and clean-up solvents at this source with various VOM contents provided that the materials are tested in accordance with the conditions of this section, the source wide emission limitations in Condition 5.5.1 and unit specific limitations in Condition 7.3.6 are not exceeded and the affected coating line remains in compliance.

7.3.12 Compliance Procedures

- a. Compliance with the particulate matter limitations in this section is assured and achieved by the proper operation and maintenance of the filters as required by this section and the work-practices inherent in operation of an affected coating line.
- b. Compliance of the affected coating line with VOM emission limitations in Condition 7.3.3(b) shall be based on the recordkeeping requirements in Condition 7.3.9 and by the use of either testing as required in Condition 7.3.7 or by use of the formula listed below:

$$\text{VOM Coating Content} = V \times D / [1 - W \times D],$$

Where:

V = Percent VOM in the coating (%)

D = Overall coating density (lb/gal)

$$W = \sum (w_i / d_i),$$

Where:

w_i = Percent exempt compound i in the coating,

d_i = Overall density of exempt compound i, lb/gal

and the summation Σ is applied over water and all exempt compounds i in the coating.

- c. Compliance with annual VOM emission limits in Conditions 5.5.1 and 7.3.6 shall be determined as follows (Note: total HAP emissions for the entire Group 3 shall be calculated based on the same equations by replacing VOM with appropriate HAP parameters):

i. Total Group 3 Emissions

$$E_{ss} = \sum_{i=1}^n SS_{(i)} \times S_{SS(i)} \times V_{SS(i)}$$

$$E_{WS} = (WS \times V_{WS}) - (W_{WS} \times V_{WWS})$$

$$E_{TOTAL} = E_{ss} + E_{WS}$$

ii. Lines 10, 23, and 25 (combined) and 11 (separate)

$$E_{ss(LL)} = \sum_{i=1}^n SS_{(LL)(i)} \times S_{SS(i)} \times V_{SS(i)}$$

$$E_{WS(LL)} = E_{WS} \times (SS_{(LL)}/SS)$$

$$E_{TOTAL(LL)} = E_{ss(LL)} + E_{WS(LL)}$$

Where:

E_{ss} = Monthly side seam coating VOM emissions (lb VOM/mo)

E_{WS} = Monthly VOM emissions from side seam wash solvent (lb VOM/mo)

E_{TOTAL} = Monthly total VOM emissions from Group 3 (lb VOM/mo)

$E_{ss(LL)}$ = Combined monthly side seam VOM emissions from Lines 10, 23, and 25 (lb VOM/mo); and separately for Line 11

$E_{WS(LL)}$ = Combined monthly VOM emissions from side seam wash solvent for Lines 10, 23 and 25 (lb VOM/mo); and separately for line 11

$E_{TOTAL(LL)}$ = Combined monthly total VOM emissions from Lines 10, 23 and 25

(lb VOM/mo); and separately for line 11

SS = Monthly consumption of side seam coating for all lithographic printing lines (gal/mo)

$SS_{(LL)}$ = Combined monthly consumption of side seam coating for Lines 10, 23, and 25 (gal/mo); and separately for Line 11

S_{SS} = Solids content of side seam coatings (gal solids/gal coating)

V_{SS} = VOM content of side seam coatings (lb VOM/gal of solids)

WS = Combined monthly volume of wash solvent used on all side seam applicators (gal/mo)

V_{WS} = VOM content of side seam wash solvent (lb VOM/gal)

W_{WS} = Monthly combined generation of spent wash solvent from all side seam applicators (gal/mo)

V_{WWS} = Average VOM content of spent side seam wash solvent (lb VOM/gal)

7.4 Group 4: Natural Gas-Fired Combustion Emission Units

7.4.1 Description

Natural gas-fired ovens used to thermally cure coatings.
Natural gas-fired space heaters are used to produce comfort heating at this source.

7.4.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Equipment	Description	Emission Control Equipment
Group 4	Natural Gas-Fired Combustion Emission Units	-Six Identical Natural Gas-Fired Heaters with Total Firing Rate 39.6 mmBtu/hr; -Three Curing Ovens (For Coating Lines); -Two Curing Ovens for Printing Lines.	None

7.4.3 Applicability Provisions and Applicable Regulations

An "affected natural gas-fired combustion emission units" for the purpose of these unit specific conditions is either a natural gas-fired heater which is used to produce comfort heating at the source or a curing oven used to thermally cure coatings.

7.4.4 Non-Applicability of Regulations of Concern

- a. Affected natural gas-fired combustion emission unit is not subject to 35 IAC 217.141, Emissions of Nitrogen Oxides From Existing Fuel Combustion Emission Sources In Major Metropolitan Areas, because the actual heat input of each unit is less than 73.2 MW (250 mmBtu/hr).
- b. Affected natural gas-fired combustion emission unit is not subject to 35 IAC 216.121, Fuel Combustion Emission Sources, because the actual heat input from each unit is less than 2.9 MW (10 mmBtu/hr).
- c. Pursuant to 35 IAC 218.303, any fuel combustion emission units are not subject to 35 IAC Part 218, Subpart G: Use of Organic Material.

7.4.5 Operational and Production Limits and Work Practices

None

7.4.6 Emission Limitations

Total emissions and operation of all affected natural gas-fired combustion emission units shall not exceed the following limits:

Natural Gas Usage		NO _x Emissions	
<u>(mmscf/Mo)</u>	<u>(mmscf/Yr)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
100.0	490.0	5.0	24.5

These limits originate from Construction Permit #95020065 and based on the maximum operating rate and standard emission factors given by AP-42. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

7.4.7 Testing Requirements

None

7.4.8 Monitoring Requirements

None

7.4.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for the boilers to demonstrate compliance with conditions of this permit, pursuant to Section 39.5(7)(b) of the Act:

Total natural gas usage, in terms of scf /month and scf/year.

7.4.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the control and operating requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.4.12 Compliance Procedures

Compliance with the emission limits established in Conditions 5.5.1 and 7.4.6 of this permit shall be based on the recordkeeping requirements in Condition 7.4.9 and the emission factors and formulas listed below:

Maximum heating capacity < 100 mmBtu/hr for each fuel combustion unit:

<u>Pollutant</u>	<u>Natural Gas Emission Factors (Lb/10⁶ ft³)</u>
PM	7.6
NO _x	100
SO ₂	0.6
VOM	5.5

These are the emission factors for uncontrolled natural gas combustion in small boilers (<100 mmBtu/hr), Tables 1.4-1 and 1.4-2, AP-42, Volume I, March 1998.

Emissions (lb) = natural gas consumed multiplied by the appropriate emission factor.

8.0 GENERAL PERMIT CONDITIONS

8.1 Permit Shield

Pursuant to Section 39.5(7)(j) of the Act, the Permittee has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements which were applicable as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the Illinois EPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source and this determination (or a concise summary thereof) is included in this permit.

This permit shield does not extend to applicable requirements which are promulgated after _____ (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

This source is not an affected source under Title IV of the CAA and is not subject to requirements pursuant to Title IV of the CAA.

8.3 Emissions Trading Programs

As of the date of issuance of this permit, there are no such economic incentive, marketable permit or emission trading programs that have been approved by USEPA.

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

Physical or operational changes specifically addressed by the Conditions of this permit that have been identified as not requiring Illinois EPA notification may be implemented without prior notice to the Illinois EPA.

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes that contravene express permit terms without applying for or obtaining an amendment to this permit, provided that [Section 39.5(12)(a)(i) of the Act]:

- a. The changes do not violate applicable requirements;
- b. The changes do not contravene federally enforceable permit terms or conditions that are monitoring

(including test methods), recordkeeping, reporting, or compliance certification requirements;

- c. The changes do not constitute a modification under Title I of the CAA;
- d. Emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change; and
- e. The Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change. This notice shall:
 - i. Describe the physical or operational change;
 - ii. Identify the schedule for implementing the physical or operational change;
 - iii. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;
 - iv. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
 - v. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Condition 8.6.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

If monitoring is required by any applicable requirements or conditions of this permit, a report summarizing the required monitoring results, as specified in the

conditions of this permit, shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7)(f) of the Act]:

<u>Monitoring Period</u>	<u>Report Due Date</u>
January - June	September 1
July - December	March 1

All instances of deviations from permit requirements must be clearly identified in such reports. All such reports shall be certified in accordance with Condition 9.9.

8.6.2 Test Notifications

Unless otherwise specified elsewhere in this permit, a written test plan for any test required by this permit shall be submitted to the Illinois EPA for review at least 60 days prior to the testing pursuant to Section 39.5(7)(a) of the Act. The notification shall include at a minimum:

- a. The name and identification of the affected unit(s);
- b. The person(s) who will be performing sampling and analysis and their experience with similar tests;
- c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;
- d. The specific determination of emissions and operation which are intended to be made, including sampling and monitoring locations;
- e. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods;
- f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and
- g. Any proposed use of an alternative test method, with detailed justification.

8.6.3 Test Reports

Unless otherwise specified elsewhere in this permit, the results of any test required by this permit shall be

submitted to the Illinois EPA within 60 days of completion of the testing. The test report shall include at a minimum [Section 39.5(7)(e)(i) of the Act]:

- a. The name and identification of the affected unit(s);
- b. The date and time of the sampling or measurements;
- c. The date any analyses were performed;
- d. The name of the company that performed the tests and/or analyses;
- e. The test and analytical methodologies used;
- f. The results of the tests including raw data, and/or analyses including sample calculations;
- g. The operating conditions at the time of the sampling or measurements; and
- h. The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

8.6.4 Reporting Addresses

- a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:
 - i. Illinois EPA - Air Compliance Section

Illinois Environmental Protection Agency
Bureau of Air
Compliance Section (MC 40)
P.O. Box 19276
Springfield, Illinois 62794-9276
 - ii. Illinois EPA - Air Regional Field Office

Illinois Environmental Protection Agency
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016
 - iii. Illinois EPA - Air Permit Section

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section (MC 11)
P.O. Box 19506
Springfield, Illinois 62794-9506

iv. USEPA Region 5 - Air Branch

USEPA (AE - 17J)
Air & Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604

- b. Unless otherwise specified in the particular provision of this permit, reports shall be sent to the Illinois EPA - Air Compliance Section with a copy sent to the Illinois EPA - Air Regional Field Office.

8.7 Obligation to Comply with Title I Requirements

Any term, condition, or requirement identified in this permit by T1, T1R, or T1N is established or revised pursuant to 35 IAC Part 203 or 40 CFR 52.21 ("Title I provisions") and incorporated into this permit pursuant to both Section 39.5 and Title I provisions. Notwithstanding the expiration date on the first page of this permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

- 9.1.1 The issuance of this permit does not release the Permittee from compliance with State and Federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or applicable ordinances, except as specifically stated in this permit and as allowed by law and rule [Section 39.5(7)(j)(iv) of the Act].
- 9.1.2 In particular, this permit does not alter or affect the following:
 - a. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section;
 - b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
 - c. The applicable requirements of the acid rain program consistent with Section 408(a) of the CAA; and
 - d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the CAA.
- 9.1.3 Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

The Permittee must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the CAA and the Act, and is grounds for any or all of the following: enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application [Section 39.5(7)(o)(i) of the Act].

The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner unless an alternate schedule for compliance with the applicable requirement is established.

9.2.2 Duty to Maintain Equipment

The Permittee shall maintain all equipment covered under this permit in such a manner that the performance or operation of such equipment shall not cause a violation of applicable requirements.

9.2.3 Duty to Cease Operation

No person shall cause, threaten or allow the continued operation of any emission unit during malfunction or breakdown of the emission unit or related air pollution control equipment if such operation would cause a violation of an applicable emission standard, regulatory requirement, ambient air quality standard or permit limitation unless such malfunction or breakdown is allowed by a permit condition [Section 39.5(6)(c) of the Act].

9.2.4 Disposal Operations

The source shall be operated in such a manner that the disposal of air contaminants collected by the equipment operations, or activities shall not cause a violation of the Act or regulations promulgated thereunder.

9.2.5 Duty to Pay Fees

The Permittee must pay fees to the Illinois EPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto [Section 39.5(7)(o)(vi) of the Act]. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois Environmental Protection Agency, P.O. Box 19276, Springfield, Illinois 62794-9276.

9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Section 39.5(7)(a) and (p)(ii) of the Act and 415 ILCS 5/4]:

- a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control

equipment), practices, or operations regulated or required under this permit;

- d. Sample or monitor any substances or parameters at any location:
 - i. At reasonable times, for the purposes of assuring permit compliance; or
 - ii. As otherwise authorized by the CAA, or the Act.
- e. Obtain and remove samples of any discharge or emission of pollutants authorized by this permit; and
- f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source authorized by this permit.

9.4 Obligation to Comply with Other Requirements

The issuance of this permit does not release the Permittee from applicable State and Federal laws and regulations, and applicable local ordinances addressing subjects other than air pollution control.

9.5 Liability

9.5.1 Title

This permit shall not be considered as in any manner affecting the title of the premises upon which the permitted source is located.

9.5.2 Liability of Permittee

This permit does not release the Permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the sources.

9.5.3 Structural Stability

This permit does not take into consideration or attest to the structural stability of any unit or part of the source.

9.5.4 Illinois EPA Liability

This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any

loss due to damage, installation, maintenance, or operation of the source.

9.5.5 Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege [Section 39.5(7)(o)(iv) of the Act].

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

A maintenance record shall be kept on the premises for each item of air pollution control equipment. As a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

9.6.2 Records of Changes in Operation

A record shall be kept describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes [Section 39.5(12)(b)(iv) of the Act].

9.6.3 Retention of Records

- a. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit [Section 39.5(7)(e)(ii) of the Act].
- b. Other records required by this permit shall be retained for a period of at least 5 years from the date of entry unless a longer period is specified by a particular permit provision.

9.7 Annual Emissions Report

The Permittee shall submit an annual emissions report to the Illinois EPA, Compliance Section no later than May 1 of the following year, as required by 35 IAC Part 254.

9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit annual compliance certifications. The compliance

certifications shall be submitted no later than May 1 or more frequently as specified in the applicable requirements or by permit condition. The compliance certifications shall be submitted to the Air Compliance Section, Air Regional Field Office, and USEPA Region 5 - Air Branch. The addresses for the submittal of the compliance certifications are provided in Condition 8.6.4 of this permit.

- a. The certification shall include the identification of each term or condition of this permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.
- b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.
- c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

9.9 Certification

Any document (including reports) required to be submitted by this permit shall contain a certification by a responsible official of the Permittee that meets the requirements of Section 39.5(5) of the Act [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as an attachment to this permit.

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit [Section 39.5(7)(o)(ii) of the Act].

9.10.2 Emergency Provision

- a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:
 - i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency.

Normally, an act of God such as lightning or flood is considered an emergency;

- ii. The permitted source was at the time being properly operated;
 - iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and
 - iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.
- b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

9.11 Permanent Shutdown

This permit only covers emission units and control equipment while physically present at the indicated source location(s). Unless this permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item of equipment on the date it is removed from the permitted location(s) or permanently shut down. This permit expires if all equipment is removed from the permitted location(s), notwithstanding the expiration date specified on this permit.

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

This permit may be modified, reopened, and reissued, for cause pursuant to Section 39.5(15) of the Act. The filing of a request by the Permittee for a permit modification, revocation, and reissuance, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition [Section 39.5(7)(o)(iii) of the Act].

9.12.2 Reopening and Revision

This permit must be reopened and revised if any of the following occur [Section 39.5(15) (a) of the Act]:

- a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;
- b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program;
- c. The Illinois EPA or USEPA determines that this permit contains a material mistake or inaccurate statement when establishing the emission standards or limitations, or other terms or conditions of this permit; and
- d. The Illinois EPA or USEPA determines that this permit must be revised to ensure compliance with the applicable requirements of the Act.

9.12.3 Inaccurate Application

The Illinois EPA has issued this permit based upon the information submitted by the Permittee in the permit application. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation under Section 39.5(15) (b) of the Act.

9.12.4 Duty to Provide Information

The Permittee shall furnish to the Illinois EPA, within a reasonable time specified by the Illinois EPA any information that the Illinois EPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to the Illinois EPA copies of records required to be kept by this permit, or for information claimed to be confidential, the Permittee may furnish such records directly to USEPA along with a claim of confidentiality [Section 39.5(7) (o) (v) of the Act].

9.13 Severability Clause

The provisions of this permit are severable, and should any one or more be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected. The rights and obligations of the Permittee shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements

underlying these provisions shall remain in force [Section 39.5(7)(i) of the Act].

9.14 Permit Expiration and Renewal

The right to operate terminates on the expiration date unless the Permittee has submitted a timely and complete renewal application. For a renewal to be timely it must be submitted no later than 9 and no sooner than 12 months prior to expiration. The equipment may continue to operate during the renewal period until final action is taken by the Illinois EPA, in accordance with the original permit conditions [Section 39.5(5)(1), (n), and (o) of the Act].

10.0 ATTACHMENTS

10.1 Attachment 1 - Nonattainment NSR Applicability - VOM Netting Analysis

Contemporaneous Time Period of 1998 Through 2002

Table I - Emissions Increases and Decreases Associated With The Proposed Modification

Item of Equipment	Past Actual (Tons/Yr)	Future Potential (Tons/Yr)	Emissions Increase (Tons/Year)
Coating Line #10	0.00	20.90	20.90

Table II - Source-Wide Creditable Contemporaneous Emission Increases

Item of Equipment	Emissions Increase (Tons/Year)	Permit #	Date
Press Line 9	15.00	02040076	6/02
Planeta	24.30	99070022	12/99
Line 11	10.64	99070022	12/99
Lab Coater	0.31	99070022	12/99
Total:	50.25		

Table III - Source-Wide Creditable Contemporaneous Emission Decreases

Item of Equipment	Commencement of Operational Change Date	Emissions Decrease (Tons/Year)	Permit #
Line 3	12/99	33.00	99070022
Line 4	12/99	30.80	99070022
Total:		63.80	

Table IV - Net Emissions Change

	(Tons/Year)
Increases Associated With The Proposed Modification	20.90
Creditable Contemporaneous Emission Increases	50.25
Creditable Contemporaneous Emission Decreases	63.80
Net Change	+7.35

10.2. Attachment 2 - Process Emission Units for Which Construction or Modification Commenced On or After April 14, 1972

- a. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 [35 IAC 212.321(a)].
- b. The emissions of particulate matter into the atmosphere in any one hour period from the affected coating lines shall not exceed the allowable emission rates specified in the following equation:

$$E = A (P)^B$$

Where:

P = Process weight rate

E = Allowable emission rate

- i. For process weight rates of 408 Mg/hr (450 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.214	2.54
B	0.534	0.534

- ii. For process weight rates in excess of 408 Mg/hr (450 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	11.42	24.8
B	0.16	0.16

- c. Limits for Process Emission Units for which Construction or Modification Commenced On or After April 14, 1972 [35 IAC 212.321(c)]:

Metric		English	
P	E	P	E
Mg/hr	kg/hr	T/hr	lb/hr
0.05	0.25	0.05	0.55
0.1	0.29	0.10	0.77
0.2	0.42	0.2	1.10
0.3	0.64	0.30	1.35
0.4	0.74	0.40	1.58
0.5	0.84	0.50	1.75
0.7	1.00	0.75	2.40
0.9	1.15	1.00	2.60
1.8	1.66	2.00	3.70
2.7	2.1	3.00	4.60
3.6	2.4	4.00	5.35
4.5	2.7	5.00	6.00
9.0	3.9	10.00	8.70
13.0	4.8	15.00	10.80
18.0	5.7	20.00	12.50
23.0	6.5	25.00	14.00
27.0	7.1	30.00	15.60
32.0	7.7	35.00	17.00
36.0	8.2	40.00	18.20
41.0	8.8	45.00	19.20
45.0	9.3	50.00	20.50
90.0	13.4	100.00	29.50
140.0	17.0	150.00	37.00
180.0	19.4	200.00	43.00
230.0	22.0	250.00	48.50
270.0	24.0	300.00	53.00
320.0	26.0	350.00	58.00
360.0	28.0	400.00	62.00
408.0	30.1	450.00	66.00
454.0	30.4	500.00	67.00

10.3 Attachment 3 - Example Certification by a Responsible Official

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____

10.4 Attachment 4 - Compliance Assurance Monitoring (CAM) Plan

Table 1 - PSEU Designation:	Lines: C1, C2, C10, PC3, PC4
Pollutant:	VOM

Indicators:	#1: Oxidizer's Temperature	#2: Permanent Total Enclosure (PTE) Natural Draft Opening (NDO) Face Velocity
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GENERAL CRITERIA

THE MONITORING APPROACH USED TO MEASURE THE INDICATORS:	Thermocouple in combustion chamber with output to a continuous strip chart recorder	Manual readings with portable velometer
THE INDICATOR RANGE WHICH PROVIDES A REASONABLE ASSURANCE OF COMPLIANCE:	> 1450°F (derived from the temperature monitoring during most recent test - September 2003)	>200 fpm (required PTE design criteria per USEPA Method 204)
QUALITY IMPROVEMENT PLAN (QIP) THRESHOLD LEVELS:	7 of 150 days during the 6-month reporting period, where a 3-hr average temperature falls below 1450°F	7 of 150 days with a < 200 fpm NDO velocity during 6-month reporting period (failure to acquire data considered < 200 fpm deviation)

PERFORMANCE CRITERIA

THE SPECIFICATIONS FOR OBTAINING REPRESENTATIVE DATA:	A thermocouple in combustion chamber with output to a continuous strip chart recorder	Face velocity with portable velometer at the NDOs located either in the PTE sidewall or as gaps in the plastic strip curtain at the in-feed conveyor opening
VERIFICATION PROCEDURES TO CONFIRM THE OPERATIONAL STATUS OF THE MONITORING:	RTO interlock system stops sheet feeders if this thermocouple fails	Manual monitoring and employee training used to ensure consistent data acquisition

Indicators:	#1: Oxidizer's Temperature	#2: Permanent Total Enclosure (PTE) Natural Draft Opening (NDO) Face Velocity
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QUALITY ASSURANCE AND QUALITY CONTROL (QA/QC) PRACTICES THAT ENSURE THE VALIDITY OF THE DATA:	Thermocouple calibrated by outside service on a quarterly basis	Velometer calibrated annually per manufacturer recommendation, or a new unit will be acquired annually
THE MONITORING FREQUENCY:	Continuous output to a strip chart recorder	One manual reading per 24-hr period
THE DATA COLLECTION PROCEDURES THAT WILL BE USED:	Continuous thermocouple reading to strip chart recorder	Manual entry on log sheet
THE DATA AVERAGING PERIOD FOR DETERMINING WHETHER AN EXCURSION OR EXCEEDANCE HAS OCCURRED:	Strip charts inspected to determine if any 3-hr temperature averages fell below 1450°F	Single daily reading compared to indicator value

10.5 Attachment 5 - Guidance on Revising This Permit

The Permittee must submit an application to the Illinois EPA using the appropriate revision classification in accordance with Sections 39.5(13) and (14) of the Act and 35 IAC 270.302. Specifically, there are currently three classifications for revisions to a CAAPP permit. These are:

1. Administrative Permit Amendment;
2. Minor Permit Modification; and
3. Significant Permit Modification.

The Permittee must determine, request, and submit the necessary information to allow the Illinois EPA to use the appropriate procedure to revise the CAAPP permit. A brief explanation of each of these classifications follows.

1. Administrative Permit Amendment
 - Corrects typographical errors;
 - Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;
 - Requires more frequent monitoring or reporting by the Permittee;
 - Allows for a change in ownership or operational control of the source where no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittees has been submitted to the Illinois EPA;
 - Incorporates into the CAAPP permit a construction permit, provided the conditions of the construction permit meet the requirements for the issuance of CAAPP permits; or
 - Incorporates into the CAAPP permit revised limitations or other requirements resulting from the application of an approved economic incentives rule, marketable permits rule, or generic emissions trading rule.
2. Minor Permit Modification
 - Do not violate any applicable requirement;

- Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;
- Do not require a case-by-case determination of an emission limitation or other standard, or a source-specific determination of ambient impacts, or a visibility or increment analysis;
- Do not seek to establish or change a permit term or condition for which there is no corresponding underlying requirement and which avoids an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
 - A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I of the CAA; and
 - An alternative emissions limit approved pursuant to regulations promulgated under Section 112(i)(5) of the CAA.
- Are not modifications under any provision of Title I of the CAA; and
- Are not required to be processed as a significant permit modification.

An application for a minor permit modification shall include the following:

- A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
- The source's suggested draft permit/conditions;
- Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and
- Information as contained on form 271-CAAPP for the Illinois EPA to use to notify USEPA and affected States.

3. Significant Permit Modification

- Applications that do not qualify as either minor permit modifications or as administrative permit amendments;
- Applications requesting a significant change in existing monitoring permit terms or conditions;
- Applications requesting a relaxation of reporting or recordkeeping requirements; and
- Cases in which, in the judgment of the Illinois EPA, action on an application for modification would require decisions to be made on technically complex issues.

An application for a significant permit modification shall include the following:

- A detailed description of the proposed change(s), including all physical changes to equipment, changes in the method of operation, changes in emissions of each pollutant, and any new applicable requirements which will apply as a result of the proposed change. Note that the Permittee need only submit revised forms for equipment and operations that will be modified.

The Illinois EPA requires the information on the following appropriate forms to be submitted in accordance with the proper classification:

- Form 273-CAAPP, REQUEST FOR ADMINISTRATIVE PERMIT AMENDMENT FOR CAAPP PERMIT; or
- Form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT; or
- Form 200-CAAPP, APPLICATION FOR CAAPP PERMIT (for significant modification).

Application forms can be obtained from the Illinois EPA website at <http://www.epa.state.il.us/air/forms>.

Note that the request to revise the permit must be certified for truth, accuracy, and completeness by a responsible official.

Note that failure to submit the required information may require the Illinois EPA to deny the application. The Illinois EPA reserves the right to require that additional information be submitted as needed to evaluate or take final action on applications pursuant to Section 39.5(5)(g) of the Act and 35 IAC 270.305.



Illinois Environmental Protection Agency
Division Of Air Pollution Control -- Permit Section
P.O. Box 19506
Springfield, Illinois 62794-9506

Application For Construction Permit (For CAAPP Sources Only)	For Illinois EPA use only
	I.D. number:
	Permit number:
	Date received:

This form is to be used by CAAPP sources to supply information necessary to obtain a construction permit. Please attach other necessary information and completed CAAPP forms regarding this construction/modification project.

Source Information		
1. Source name:		
2. Source street address:		
3. City:	4. Zip code:	
5. Is the source located within city limits? <input type="checkbox"/> Yes <input type="checkbox"/> No		
6. Township name:	7. County:	8. I.D. number:

Owner Information		
9. Name:		
10. Address:		
11. City:	12. State:	13. Zip code:

Operator Information (if different from owner)		
14. Name		
15. Address:		
16. City:	17. State:	18. Zip code:

Applicant Information	
19. Who is the applicant? <input type="checkbox"/> Owner <input type="checkbox"/> Operator	20. All correspondence to: (check one) <input type="checkbox"/> Owner <input type="checkbox"/> Operator <input type="checkbox"/> Source
21. Attention name and/or title for written correspondence:	
22. Technical contact person for application:	23. Contact person's telephone number:

This Agency is authorized to require and you must disclose this information under 415 ILCS 5/39. Failure to do so could result in the application being denied and penalties under 415 ILCS 5 et seq. It is not necessary to use this form in providing this information. This form has been approved by the forms management center.

Summary Of Application Contents	
24.	Does the application address whether the proposed project would constitute a new major source or major modification under each of the following programs: a) Non-attainment New Source Review – 35 IAC Part 203; b) Prevention of Significant Deterioration (PSD) – 40 CFR 52.21; c) Hazardous Air Pollutants: Regulations Governing Constructed or Reconstructed Major Sources – 40 CFR Part 63?
	<input type="checkbox"/> Yes <input type="checkbox"/> No
25.	Does the application identify and address all applicable emissions standards, including those found in the following: a) Board Emission Standards – 35 IAC Chapter I, Subtitle B; b) Federal New Source Performance Standards – 40 CFR Part 60; c) Federal Standards for Hazardous Air Pollutants – 40 CFR Parts 61 and 63?
	<input type="checkbox"/> Yes <input type="checkbox"/> No
26.	Does the application include a process flow diagram(s) showing all emission units and control equipment, and their relationship, for which a permit is being sought?
	<input type="checkbox"/> Yes <input type="checkbox"/> No
27.	Does the application include a complete process description for the emission units and control equipment for which a permit is being sought?
	<input type="checkbox"/> Yes <input type="checkbox"/> No
28.	Does the application include the information as contained in completed CAAPP forms for all appropriate emission units and air pollution control equipment, listing all applicable requirements and proposed exemptions from otherwise applicable requirements, and identifying and describing any outstanding legal actions by either the USEPA or the Illinois EPA? Note: The use of "APC" application forms is not appropriate for applications for CAAPP sources. CAAPP forms should be used to supply information.
	<input type="checkbox"/> Yes <input type="checkbox"/> No
29.	If the application contains TRADE SECRET information, has such information been properly marked and claimed, and have two separate copies of the application suitable for public inspection and notice been submitted, in accordance with applicable rules and regulations?
	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable, No TRADE SECRET information in this application

Note 1: Answering "No" to any of the above may result in the application being deemed incomplete.

Signature Block	
This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete.	
30. I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate and complete. Authorized Signature:	
BY:	
_____	_____
AUTHORIZED SIGNATURE	TITLE OF SIGNATORY
_____	_____ / _____ / _____
TYPED OR PRINTED NAME OF SIGNATORY	DATE

Note 2: An operating permit for the construction/modification permitted in a construction permit must be obtained by applying for the appropriate revision to the source's CAAPP permit, if necessary.

10.7 Attachment 7 - Guidance on Renewing This Permit

Timeliness - Pursuant to Section 39.5(5)(n) of the Act and 35 IAC 270.301(d), a source must submit to the Illinois EPA a complete CAAPP application for the renewal of a CAAPP permit not later than 9 months before the date of permit expiration of the existing CAAPP permit in order for the submittal to be deemed timely. Note that the Illinois EPA typically sends out renewal notices approximately 18 months prior to the expiration of the CAAPP permit.

The CAAPP application must provide all of the following information in order for the renewal CAAPP application to be deemed complete by the Illinois EPA:

1. A completed renewal application form 200-CAAPP, APPLICATION FOR CAAPP PERMIT.
2. A completed compliance plan form 293-CAAPP, COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE FOR CAAPP PERMIT.
3. A completed compliance certification form 296-CAAPP, COMPLIANCE CERTIFICATION, signed by the responsible official.
4. Any applicable requirements that became effective during the term of the permit and that were not included in the permit as a reopening or permit revision.
5. If this is the first time this permit is being renewed and this source has not yet addressed CAM, the application should contain the information on form 464-CAAPP, COMPLIANCE ASSURANCE MONITORING (CAM) PLAN.
6. Information addressing any outstanding transfer agreement pursuant to the ERMS.
7.
 - a. If operations of an emission unit or group of emission units remain unchanged and are accurately depicted in previous submittals, the application may contain a letter signed by a responsible official that requests incorporation by reference of existing information previously submitted and on file with the Illinois EPA. This letter must also include a statement that information incorporated by reference is also being certified for truth and accuracy by the responsible official's signing of the form 200-CAAPP, APPLICATION FOR CAAPP PERMIT and the form 296-CAAPP, COMPLIANCE CERTIFICATION. The boxes should be marked yes on form 200-CAAPP, APPLICATION FOR CAAPP PERMIT, as existing information is being incorporated by reference.

- b. If portions of current operations are not as described in previous submittals, then in addition to the information above for operations that remain unchanged, the application must contain the necessary information on all changes, e.g., discussion of changes, new or revised CAAPP forms, and a revised fee form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT, if necessary.
- 8. Information about all off-permit changes that were not prohibited or addressed by the permit to occur without a permit revision and the information must be sufficient to identify all applicable requirements, including monitoring, recordkeeping, and reporting requirements, for such changes.
- 9. Information about all changes made under 40 CFR 70.4(b)(12)(i) and (ii) that require a 7-day notification prior to the change without requiring a permit revision.

The Illinois EPA will review all applications for completeness and timeliness. If the renewal application is deemed both timely and complete, the source shall continue to operate in accordance with the terms and conditions of its CAAPP permit until final action is taken on the renewal application.

Notwithstanding the completeness determination, the Illinois EPA may request additional information necessary to evaluate or take final action on the CAAPP renewal application. If such additional information affects your allowable emission limits, a revised form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT must be submitted with the requested information. The failure to submit to the Illinois EPA the requested information within the time frame specified by the Illinois EPA, may force the Illinois EPA to deny your CAAPP renewal application pursuant to Section 39.5 of the Act.

Application forms may be obtained from the Illinois EPA website at <http://www.epa.state.il.us/air/forms.html>.

If you have any questions regarding this matter, please contact a permit analyst at 217/782-2113.

Mail renewal applications to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section (MC 11)
P.O. Box 19506
Springfield, Illinois 62794-9506